

1 CRAIG A. MUELLER, ESQ.  
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2 **MUELLER & ASSOCIATES, INC.**  
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5 *Attorney for Plaintiff*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8  
9 HOGLA FLORES-REYES,  
10 Plaintiff,

11 vs.

12 LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
13 State of Nevada; SERGEANT BRYAN  
KIRWIN, employed with the LAS VEGAS  
14 METROPOLITAN POLICE  
DEPARTMENT, OFFICER B. REDD,  
15 employed with the LAS VEGAS  
METROPOLITAN POLICE  
16 DEPARTMENT, OFFICER ANDRE  
GONZALEZ, employed with the LAS  
17 VEGAS METROPOLITAN POLICE  
DEPARTMENT, LIEUTENANT JOHN W.  
18 LILES, employed with the LAS VEGAS  
METROPOLITAN POLICE  
19 DEPARTMENT, DOE OFFICERS employed  
with the LAS VEGAS METROPOLITAN  
20 POLICE DEPARTMENT; DOES III through  
X; and ROE CORPORATIONS I through X,  
21 inclusive,  
22 Defendants.

Case No.: 2:24-cv-00302-EJY

**STIPULATION TO EXTEND TIME TO**  
**FILE OPPOSITION TO**  
**DEFENDANT'S MOTION FOR**  
**SUMMARY JUDGMENT AND**  
**EXTENSION OF TIME TO FILE**  
**REPLY IN SUPPORT OF MOTION**  
**FOR SUMMARY JUDGMENT**

(Second Request)

23 Pursuant to Fed. R. Civ. P. ("FRCP") 6(b)(1) and local rules IA 6-1, IA 6-2, and 26-3,  
24 Plaintiff, by and through her attorneys of record, MUELLER & ASSOCIATES, INC., and  
25 Defendants, by and through their attorneys of record, MARQUIS & AURBACH, hereby stipulate  
26 and request that this Court extend the deadlines regarding Defendants' Motion for Summary  
27 Judgment (ECF No. 16) ("Motion") filed December 30, 2025. There is no hearing date.  
28

1 The current deadline to file a Response to the Motion is February 17, 2025. On February  
 2 10, 2025, counsel for Plaintiff emailed a request to counsel for Defendants to inquire if counsel for  
 3 Defendants would agree to an additional two-week extension for Plaintiff to file her Response to  
 4 the Motion due to the handling attorney recently separating from the firm. Defendants graciously  
 5 responded agreeing to an extension. Accordingly, Plaintiff is seeking an additional two (2) week  
 6 extension of time to respond to the Motion, up to and including Monday, March 3, 2025, and  
 7 Defendants shall have two (2) weeks thereafter, or up to and including March 17, 2025, to file their  
 8 Reply in Support of Motion.  
 9

10 Good cause exists to grant the requested extension as counsel for Plaintiff's handling  
 11 attorney separating from Plaintiff's counsel's law firm, additional time to prepare an Opposition  
 12 is needed.  
 13

14 The parties' respective counsel has agreed on the proposed extensions to make the new  
 15 deadline for Plaintiff's Response due on or before March 3, 2025, and the Defendants' Reply in  
 16 Support extended an additional 2 weeks.

17 This is the second stipulation for extension of time to file a Response to the Motion and a  
 18 Reply in Support of said Motion.  
 19

20 **IT IS SO STIPULATED.**

21 DATED this 21<sup>st</sup> day of February, 2025.

22 **MUELLER & ASSOCIATES, INC.**

23 */s/ Craig A. Mueller, Esq.*

24 CRAIG A. MUELLER, ESQ.  
 25 Nevada Bar No. 4703  
 26 808 S. 7<sup>th</sup> Street  
 27 Las Vegas, NV 89101  
 28 *Attorney for Plaintiff*

DATED this 21<sup>st</sup> day of February, 2025.

**MARQUIS AURBACH**

*/s/ Craig R. Anderson, Esq.*

CRAIG R. ANDERSON, ESQ.  
 Nevada Bar No. 6882  
 10001 Park Run Drive  
 Las Vegas, NV 89145  
*Attorneys for Defendants*

**ORDER**

Upon Stipulation by counsel for the parties, and good cause appearing therefore,

**IT IS HEREBY ORDERED** that Responsive deadlines shall be as follows:

Plaintiff's Opposition Deadline: March 3, 2025

Defendants' Reply Deadline: March 17, 2025

**IT IS SO ORDERED.**

DATED this 21st day of February, 2025

  
UNITED STATES MAGISTRATE JUDGE

Submitted by

**MUELLER & ASSOCIATES, INC.**

*/s/ Craig A. Mueller, Esq.*

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CRAIG A. MUELLER, ESQ.

Nevada Bar No. 4703

808 S. 7<sup>th</sup> Street

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